REMARKS

Applicant respectfully requests reconsideration and allowance of the subject application in view of the foregoing amendments and the following remarks.

Claims 25-49 are pending in the application, with claims 25, 36, and 45 being independent. Claims 1-24 are canceled herein without prejudice to or disclaimer of the subject matter recited therein. Claims 25-49 are directed to substantially similar subject matter as the canceled claims 1-24, and are presented herein for clarity and to avoid heavy amendments to existing claims. Support for the claim amendments and additions can be found in the original disclosure. No new matter has been added.

STATEMENT OF SUBSTANCE OF INTERVIEW

Initially, Applicant wishes to thank Examiner Hamza for conducting an interview with Applicant's representative, Elliott Y. Chen, on October 3, 2008. During the interview, the Examiner and the undersigned attorney discussed the rejections of Claims 1 and 13 under 35 U.S.C. §101 and 35 U.S.C. §112, second paragraph. It is believed that agreement was reached with Examiner Hamza that the new Claims 25 and 36, as replacements for Claim 1 and 12, respectively, overcome the 35 U.S.C. §101 and 35 U.S.C. §112 rejections.

Further, the Examiner and the undersigned attorney discussed the differences between new Claims 25 and 36 and the cited reference to U.S. 5,724,346 to Kobayashi (hereinafter "Kobayashi"). The undersigned attorney thanks the Examiner for discussing these claims.

§ 101 REJECTIONS

Claims 1 and 12 stand rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter. Applicant has replaced Claim 1 with new Claim 25, and replaced Claim 12 with new Claim 36. Each of the Claims 25 and 36 recite a single statutory class of invention. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection.

§ 112 SECOND PARAGRAPH REJECTIONS

Claims 1 and 12 stand rejected under 35 U.S.C. § 112, as being indefinite, such that they are ambiguously constructed and indeterminate in scope. Applicant has replaced Claim 1 with new Claim 25, and replaced Claim 12 with new Claim 36. Each of the Claims 25 and 36 recite a single statutory class of invention. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection.

§ 102 REJECTIONS

Claims 1-3, 6, 9-12, 14-16, and 20-24 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Kobayashi. Applicant has replaced rejected Claims 1, 12, and 20 with new Claims 25, 36, and 45, respectively. Applicant respectfully traverses the rejection.

Independent Claim 25, as currently presented, recites:

> 25. A method, comprising:
>> providing a first local connection translation table to a first peer that is attached to a first network attachment point, the first peer being in a network connection with a second peer that is attached to a second network attachment point;
>> storing original connection specification of the first and second network attachment points to the first local connection translation table, the original connection specification including an original address and an original port for each attachment point;
>> storing updated connection specification of the first and second network attachment to the first local connection table when one of the first and second peer switches from the initial network attachment point to a new network attachment point, the updated connection specification including at least one of a new address or a new port that corresponds to the new network attachment point;
>> *translating an outgoing connection specification of an outbound network protocol unit* to the updated connection specification *using the first local connection translation table,* when the outgoing connection specification corresponds to the original connection specification; and
>> sending the outbound network protocol unit from the first peer and the second peer via the new attachment point. (Emphasis added).

Specifically, Kobayashi does not disclose, "*translating an outgoing connection specification of an outbound network protocol unit* to the updated connection

specification *using the first local connection translation table,* when the outgoing connection specification corresponds to the original connection specification," as recited in Claim 25. (Emphasis added).

Instead, Kobayashi discloses a master-station management table 25 that is used by a user station to move between cells. (Column 7, Lines 7-25). However, Kobayashi does not disclose that its master-station management table 25 is used for translation of *"an outgoing connection specification of an outbound network protocol unit,"* as recited in Claim 1. This is evident in the relevant section of Kobayashi, which discloses:

> When the state of communication with the old access point deteriorates and it becomes necessary to connect to the new access point, the mobile user station 14 sends a connection request to the access point held by the master-station management table 25 and then communicates via the new access point 122 Since the connectable access point is thus known in advance, the access points can be switched between in a short time without performing a time-consuming access point search operation.

(Kobayashi, Column 7, Lines 15-23). In other words, the master-station management table 25 of Kobayashi is used to "store the address of the found connectable access point," rather than the translation of *""an outgoing connection specification of an outbound network protocol unit,"* as recited in Claim 25. (Column 7, Lines 7-10).

Moreover, while Kobayashi discloses transfer data from an old access point to a new access point, Kobayashi does not disclose that the transfer is accomplished via the use of a "local connection translation table," as recited in Claim 1. The relevant section of Kobayashi discloses:

> In response to the transfer request, the old access point 12_1 transfers to the mobile user station 14, in one batch or in frame units, the data addressed to the mobile user station accumulated in the buffer as well as notification of completion of the transfer, this being performed via the new access point 12_2 The old access point discards subsequently arriving frames addressed to the mobile user station.

(Kobayashi, Column 7, Lines 63-67; Column 8, Lines 1-2). Thus, while Kobayashi discloses the transfer of data in response to an transfer request that is sent from a new access point to an old access point, Kobayashi does not disclose, *"translating an outgoing connection specification of an outbound network protocol unit* to the updated connection specification *using the first local connection translation table,* when the outgoing connection specification corresponds to the original connection specification,"* as recited in Claim 25. (Emphasis added). Accordingly, Claim 25 is believed to be allowable for at least the foregoing reasons.

Dependent Claims 26-35 depend from independent Claim 25 and are believed to be allowable by virtue of this dependency, as well as for additional features that they recite. Applicant also respectfully requests individual consideration of each dependent claim.

Claims 36-49

Independent Claim 36, as currently presented, recites:

> *translating an incoming connection specification of an inbound network protocol unit* to the original connection specification *using the local connection translation table,* when the incoming connection specification corresponds to the updated connection specification. (Emphasis added).

Likewise, **Independent Claim 45,** as currently presented, recites:

> a first translation component to *translate an outgoing connection specification of an outbound network protocol unit* to the updated connection specification *using the first local connection translation table,* when the outgoing

connection specification corresponds to the original connection specification; and

a second translation component *to translate an incoming connection specification of an inbound network protocol unit* to the original connection specification *using the local connection translation table,* when the incoming connection specification corresponds to the updated connection specification. (Emphasis added).

Applicant respectfully traverses the rejection. Specifically, Applicant incorporates the reasoning presented above to the extent that Claims 25, 36, and 45 recite the same features. Accordingly, Applicant respectfully submits that Claims 36 and 45 are also believed to be allowable over Kobayashi.

Dependent Claims 37-44 depend from **Independent Claim 36. Dependent Claims 46-49** depend from **Independent Claim 45.** Accordingly, the dependent claims are believed to be allowable by virtue of this dependency, as well as for additional features that they recite. Applicant also respectfully requests individual consideration of each dependent claim.

§ 103 REJECTIONS

Claims 4-5, 7-8, 17-19 stand rejected under 35 U.S.C. § 103(a) as being obvious over Kobayashi in view of U.S. 6,167,450 to Angwin (hereinafter "Angwin"). Claims 4-5, 7-8, 17-19 are canceled. However, to the extent that any of the newly added claims recite elements that are substantially similar to the elements of Claims 4-5, 7-8, 17-19, Applicant respectfully submit that such claims are believed to be allowable due to dependency on one of the Claims 25, 36, and 45, as Angwin's disclosures are related to IP datagram and IP address. (Abstract, Column 5, Lines 11-28; Column 10, Lines 6-23).

Due to the Applicant's earnest belief that each of the Claims 4-5, 7-8, 17-19, as rejected under Section 103(a), is at least allowable because each depends from an allowable independent claim, Applicant will not address motivation to combine with respect to these claims during this response. However, Applicant hereby reserves the right to further challenge motivation to combine the cited references.

In closing, Applicant's decision not to discuss the differences between the cited art and each dependent claim should not be considered as an admission that Applicant concurs with the conclusions set forth in the Office Action that these dependent claims are not patentable over the disclosure in the cited references. Similarly, Applicant's decision not to discuss differences between the prior art and every claim element, or every comment set forth in the Office Action, should not be considered as an admission that Applicant concurs with the interpretation and assertions presented in the Office Action regarding those claims. Indeed, Applicant believes that all of the dependent claims patentably distinguish over the references cited. Moreover, a specific traverse of the rejection of each dependent claim is not required, since dependent claims are patentable for at least the same reasons as the independent claims from which the dependent claims ultimately depend.
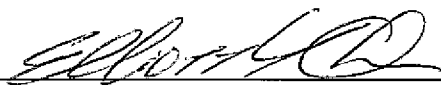
CONCLUSION

For at least the foregoing reasons, Claims 25-49 are in condition for allowance. Applicant respectfully requests reconsideration and withdrawal of the rejections and an early notice of allowance. If any issue remains unresolved that would prevent allowance of this case, **Applicant requests that the Examiner contact the undersigned attorney to resolve the issue**.

Respectfully Submitted,

Lee & Hayes, PLLC

Dated: _/0 - 9 - 0 8_   By: _____

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